

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:
Rita S Lintzeris) Case No. 22-14325
)
) Chapter 13
)
Debtor) Judge: Janet S. Baer
)

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Rita S Lintzeris
610 N Airlite
Elgin, IL 60123

DAVID FREYDIN LTD
8707 SKOKIE BLVD #305
SKOKIE, IL 60077

Please take notice that on March 03, 2023 at 10:00 am, a representative of this office shall appear before the Honorable Judge Janet S. Baer, or any judge sitting in that judge's place, either in Courtroom 615 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meetir ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 731 2971** and the passcode is **587656**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on February 24, 2023.

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Jenn Karmia

FOR: Glenn Stearns, Chapter 13 Trustee

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MOTION TO DISMISS FOR UNREASONABLE DELAY AND FAILURE TO MAKE PLAN PAYMENTS

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Monday, December 12, 2022.
2. The Debtor has failed to:
 - a. File an amended plan.
 - b. Make all required plan payments.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Respectfully Submitted;

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Pamela L. Peterson
FOR: Glenn Stearns, Chapter 13 Trustee